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October 5, 2017

VIA EMAIL (tjb_orders@njd.uscourts.gov)

Hon. Tonianne J. Bongiovanni
U.S. District Court, NJ District
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 6E
Trenton, NJ 08608

Re: Hong Kong Ibesttouch Technology Co. Ltd. v. IDistribute LLC et al.
Docket No. 3:17-cv-02441 (FLW)(TJB)

Dear Judge Bongiovanni:

I am writing with the consent of all parties in this matter to respectfully request a postponement/extension of Your Honor's October 2, 2017 Text Order for the parties to submit a proposed discovery schedule no later than October 9, 2017. In your August 24, 2017 Letter Order, Your Honor entered a stay of discovery that would be continued if either party files a motion to dismiss. Defendants filed an Answer to Plaintiff's Amended Complaint and Defendants' Amended Counterclaim this past Monday, October 2, 2017. Plaintiff's Answer to Defendants' Amended Counterclaim is due on Monday, October 16, 2017. Plaintiff intends to file a Motion to Dismiss with its responsive pleading at that time or soon thereafter. Accordingly, we respectfully request a postponement for the parties to submit a proposed discovery schedule, as it appears that the discovery stay will be continued.

We thank the Court for its attention to this matter.

So Ordered
Tonianne J. Bongiovanni
10/5/17

Respectfully submitted,

Jack Chan, Esq.
Law Office of Jack Chan LLC

cc: Joshua Bauchner, Esq.
Michael Ansell, Esq.